

THE HONORABLE DAVID G. ESTUDILLO

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TOMMY BROWN, on his own behalf and
on behalf of other similarly situated
persons,

Plaintiff,

v.

TRANSWORLD SYSTEMS, INC., *et al.*,

Defendants.

No. 2:20-cv-00680-DGE

STIPULATION AND [PROPOSED]
ORDER TO EXTEND BRIEFING
DEADLINES

NOTE ON MOTION CALENDAR:

May 31, 2022

STIPULATION

Pursuant to Western District of Washington Local Civil Rules 7(d)(1) and 10(g), Plaintiff Tommy Brown (“Plaintiff”) and Defendants Transworld Systems Inc. (“TSI”), Patenaude & Felix, APC (“P&F”), U.S. Bank National Association (“U.S. Bank”), National Collegiate Student Loan Trust 2004-1, National Collegiate Student Loan Trust 2004-2, National Collegiate Student Loan Trust 2005-1, National Collegiate Student Loan Trust 2005-2, National Collegiate Student Loan Trust 2005-3, National Collegiate Student Loan Trust 2006-1, National Collegiate Student Loan Trust 2006-2, National Collegiate Student Loan Trust 2007-1, and National Collegiate Student Loan Trust 2007-2 (collectively, “the Trusts,” and together with TSI, P&F, and U.S. Bank, “Defendants”) stipulate that Plaintiff’s deadline to file oppositions to the Defendants’ Motions to Dismiss the Amended Complaint (Dkts. No. 105-108) in the above-

1 referenced action is extended from May 31, 2022 to June 14, 2022. Likewise, the Defendants'
 2 deadline to file a Reply in Support of their Motions to Dismiss is extended from June 14, 2022 to
 3 July 19, 2021.

4 1. The Parties set their current briefing deadlines related to the Motions to Dismiss
 5 the Amended Complaint in response to stipulation and order filed in response to the Court's
 6 February 14, 2022 directive to file a status report after (Dkt. Nos. 102, 103). No prior joint
 7 requests to extend the above deadlines have been made. In addition, the Plaintiff has represented
 8 by his counsel that they require additional time to analyze the issues presented in the pending
 9 Motions to Dismiss the Amended Complaint.

10 2. The parties have entered into this stipulation and agreement to mutually cooperate
 11 in the management of this action. Accordingly, the parties hereby stipulate and agree that the
 12 deadlines set forth in the Order dated March 8, 2021 (Dkt. No. 103) should be modified as
 13 follows:
 14

15 EVENT	SCHEDULED DATE	RESCHEDULED DATE
16 Deadline for Plaintiff to file 17 Oppositions to Defendants' 18 Motions to Dismiss the 19 Amended Complaint	May 31, 2022	June 14, 2022
20 Deadline for Defendants to 21 file Reply in Support of their 22 Motions to Dismiss the 23 Amended Complaint	June 14, 2022	July 19, 2022

24 The extension of the above deadlines does not alter or modify any other rights or
 25 responsibilities of the Parties except as stated herein permitted by law or under the Federal Rules
 26 of Civil Procedure, or the Local Civil Rules.

1 DATED: May 31, 2022.

2
3 HENRY & DEGRAAFF, P.S.

4 By: /s/ Christina L. Henry
5 Christina L. Henry, WSBA No. 31273
6 113 Cherry St, PMB 58364
7 Seattle, WA 98104
8 Telephone: 206.330.0595
9 Facsimile: 206.400.7609
10 chenry@HDM-legal.com

11 *Counsel for Plaintiff*

12 BORISON FIRM, LLC

13 By: /s/ Scott Borison
14 Scott Borison, *Pro Hac Vice*
15 1900 S. Norfolk St., Suite 350
16 San Mateo, CA 94403
17 scott@borisonfirm.com

18 *Counsel for Plaintiff*

CONSUMER LAW CENTER, LLC

By: /s/ Phillip Robinson
Phillip Robinson, *Pro Hac Vice*
8737 Colesville Road, Suite 308
Silver Spring, MD 20910
phillip@marylandconsumer.com

Counsel for Plaintiff

SESSIONS, FISHMAN, NATHAN & ISRAEL

By: /s/ Justin Homes, Esq.
Bryan C. Shartle, *Pro Hac Vice*
Justin Homes, *Pro Hac Vice*
Bradley St. Angelo, *Pro Hac Vice*
3850 North Causeway Boulevard, Suite 200
Metairie, LA 70002
bshartle@sessions.legal
jhomes@sessions.legal
bstangelo@sessions.legal

CORR CRONIN LLP

Benjamin C. Byers, WSBA No. 52299
1001 Fourth Avenue, Suite 3900
Seattle, WA 98154
bbyers@corrchronin.com

Attorneys for Transworld Systems Inc.

JONES DAY

By: Albert J. Rota
Albert J. Rota, *Pro Hac Vice*
2727 North Harwood St.
Dallas, TX 75201
ajrota@jonesday.com

Attorneys for U.S. Bank National Association

PERKINS COIE LLP

LEE SMART, P.S., INC.

By: /s/ Kristine E. Kruger
Kristine E. Kruger, WSBA No. 44612
Thomas Abbott, WSBA No. 53024
1201 Third Avenue, Suite 4900
Seattle, WA 98101
Telephone: 206.359.8000
Facsimile: 206.359.9000
KKruger@perkinscoie.com
TAbbott@perkinscoie.com

By: /s/ Marc Rosenberg
Marc Rosenberg, WSBA No. 31034
1800 One Convention Place
701 Pike St.
Seattle, WA 98101
Mr@leesmart.com

Attorneys for Patenaude & Felix, APC

*Attorneys for Defendants U.S. Bank National
Association, National Collegiate Student Loan
Trust 2004-1, National Collegiate Student
Loan Trust 2004-2, National Collegiate
Student Loan Trust 2005-1, National
Collegiate Student Loan Trust 2005-2,
National Collegiate Student Loan Trust 2005-
3, National Collegiate Student Loan Trust
2006-1, National Collegiate Student Loan
Trust 2006-2, National Collegiate Student
Loan Trust 2007-1, National Collegiate
Student Loan Trust 2007-2*

[PROPOSED] ORDER

IT IS SO ORDERED. The amended deadlines are as follows:

EVENT	SCHEDULED DATE	RESCHEDULED DATE
Deadline for Plaintiff to file Oppositions to Defendants' Amended Motions to Dismiss	May 31, 2022	June 14, 2022
Deadline for Defendants to file Reply in Support of their Motions to Dismiss	June 14, 2022	July 19, 2022

The extension of the above deadlines does not alter or modify any other rights or responsibilities of the Parties except as stated herein permitted by law or under the Federal Rules of Civil Procedure, the Local Civil Rules, or the Court's Chamber's Procedures.

DATED this _____ day of May, 2022.

Honorable David G. Estudillo